



# Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency  
Region 10 – Seattle, WA

## *Clean Air Act Full Compliance Evaluation Inspection Report*

### **Seattle Iron and Metals Seattle, Washington**

**Inspection Date: June 2, 2022**

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Report Author Signature

Date

Sara Conley  
CAA Inspector  
EPA Region 10

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Peer Review Signature

Date

Brendan Whyte  
CAA/TRI Inspector  
EPA Region 10

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Section Chief Signature

Date

Derrick Terada  
ATES Section Chief  
EPA Region 10

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## **Attachments**

Attachment 1 .....	EPA Region 10 Inspection Digital Image Log
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## 1. Basic Facility and Inspection Information

Facility: Seattle Iron and Metals

Physical Address: 601 S Myrtle St, Seattle, WA 98108

ICIS-Air ID: 100000000000000034

NAICS: 423930 Recyclable Material Merchant Wholesalers

Facility Contact: Ed Armstrong, Operations Manager  
Office: (206) 834-4446  
earmstrong@seairon.com

Paul Kirkman, Safety Manger

U.S. EPA Inspectors: Sara Conley  
Air and Toxics Enforcement Section (ATES)  
Enforcement and Compliance Assurance Division (ECAD)  
U.S. EPA Region 10  
1200 Sixth Ave.  
Seattle, WA 98101  
(206) 553-6914  
[conley.sara@epa.gov](mailto:conley.sara@epa.gov)

Brendan Whyte  
ATES, ECAD  
U.S. EPA Region 10  
1200 Sixth Ave.  
Seattle, WA 98101  
(206) 553-6914  
[Whyte.brendan@epa.gov](mailto:Whyte.brendan@epa.gov)

Elly Walters  
ATES, ECAD  
U.S. EPA Region 10  
1200 Sixth Ave.  
Seattle, WA 98101  
(206) 553-6914  
[walters.elizabeth@epa.gov](mailto:walters.elizabeth@epa.gov)

Date of Inspection: June 2, 2022

Inspection Start/End Time: On site at 9:20 AM, Ed Armstrong and Paul Kirkman joined us in the conference room at about 9:25 am and we began the opening conference. The inspection concluded at 11:00 am.

Date of Report: August 9, 2022

Inspection Notice: Unannounced

Purpose of Inspection The inspection objective was to conduct an inspection of the facility in order to evaluate compliance with the Clean Air Act (CAA). Sara Conley led the CAA inspection covered in this report.

### Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

## **2. Process Description and Facility Notes**

- a) This process description is based on my observations as well as statements made by facility personnel while onsite during the inspection.
- b) General Facility Notes
  - 1. Shredder Process Description - Cars or other materials are placed on a conveyer and which feeds a chute to the DFR (double feed roll) which breaks up large items and pulls them into the mill. Hammers in the mill shred materials which pass to grates with basketball sized holes that filter out material. Undesirable material is kicked out at the hood into a separate pile. The desirable material heads up a conveyer that is covered in water sprays to control for fire. The magnetic drum separates out ferrous and non-ferrous materials. The ferrous materials fall into the z box separator. The z-box separator is vented to the baghouse.
  - 2. Products – The facility is categorized as a Recyclable Material Merchant Wholesaler. The facility shreds automobiles and other ferrous and non-ferrous materials such as refrigerators, large cast iron objects, and other metal objects, before separating and sorting the shredded materials for sale. Nucor Steel is one of the main customers of this facility.
  - 3. Equipment – Onsite activities consist of weighing, sheering, shredding, and sorting. Within the facility the equipment consists of the following:
    - i. One 4000—4500-horsepower shredder - Process materials at a rate of 100— 110 tons/hour based on what type of material is being processed.
    - ii. One 1300-ton guillotine sheerer - Processes material that is too heavy or large to go through the shredder.

- iii. Torch cutting - Used to break down materials that are too big or irregularly shaped.

### 3. Compliance History

A review of EPA's Enforcement and Compliance History Online (ECHO)<sup>1</sup> database shows that at the time of the inspection, the facility was reported as having no air enforcement activities in the last 5 years. However, ECHO indicates that there has been significant noncompliance with the Clean Water Act for 12 out of the last 12 quarters. Internet searches show that there is an existing consent decree with the Puget Soundkeeper Alliance which resulted in changes at the facility to control runoff and dust.

### 4. Records Review

#### Records Request

Because this inspection was unannounced, EPA requested records upon arrival at the on-site inspection. The facility responded to the records during the opening conference of the inspection.

I asked the facility the following questions and for the following records (selected responses are included):

1. The manufacturer rated capacity for all shredding equipment in the units of tons per hour.
2. Provide monthly process quantity for the following:
  - a. Metal shredder in the units of tons shredded, including the fraction of automobile scrap shredded in each month.
  - b. Ferrous material handling in the units of tons processed.
  - c. Non-ferrous material handling in the units of tons processed.

**Response:** 100-110 ton/hour 50-60% automobiles on average.

**Response:** Tons processed depend on the material brought on site, is highly variable.

3. Provide annual hours of operation.

**Response:** Daily operation 7am – 5pm or 7am to 6pm

4. Have you completed any emission testing?

**Response:** No emission testing.

5. Have you applied for any permits recently from PCSAA or do you have any planned projects?

**Response:** Building new equipment that will have an enhanced baghouse. They have no changes to the shredder planned. They mentioned applying for a B10 exemption for the new baghouse with PCSAA.

6. Tell me about your scrap acceptance guidelines, please provide a current version.

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<sup>1</sup> <https://echo.epa.gov/>

**Response:** A copy was provided at the inspection and is located with the file for this inspection.

7. Scrap acceptance policy review documents from the 5 most recent vendor inspections and a copy of a vendor review checklist template.
8. A copy of the load inspection procedures and load inspector checklist.
9. Does or has this facility accepted recreational vehicles (RVs) for processing? If so, do you have any special acceptance protocols for RVs? Do you conduct or require asbestos surveys for RVs prior to processing?

**Response:** The load inspection staff are trained on what to look for regarding asbestos. They say they have someone on site who specifically looks out for asbestos and is trained on how to deal with it. Ed and Paul also mentioned that they look for asbestos in other materials that they accept like refractory brick.

## **5. Inspection Elements and Field Observations – June 2, 2022**

### **a) Making Entry**

1. When we arrived onsite at 9:20 AM we each introduced ourselves to Bre at the front desk she showed us to a conference room where we meet with Ed Armstrong and Paul Kirkman.

### **b) Opening Conference (6/2/22, 9:25 – 10:10)**

1. Attendees
  - Ed Armstrong, Operations Manager
  - Paul Kirkman, Safety Manger
  - Sara Conley – Inspector, EPA Region 10
  - Brendan Whyte – Inspector, EPA Region 10
  - Elly Walters – Inspector, EPA Region 10
2. Introductions, including presentation of EPA inspector credentials.
3. Discussion regarding facility processes and equipment including the questions listed in the records section above.
4. Review of facility safety information.
5. Discussed taking photos with Ed and Paul. Brendan explained that he would be taking photos and videos throughout the inspection and the facility agreed to this. We also explained the confidential business information (CBI) policy and asked them to inform us if any photos of videos we took were CBI.
6. Discussed scope of inspection, generally to include a partial facility walkthrough and an inspection of the associated control devices.

### **c) Field Observations (6/2/2022, 10:10 am – 10:50 am)**

1. **Outside facility and water treatment:** Following the opening conference discussion, the group proceeded outside and headed toward the main entrance of the facility.
  - i. Paul and Ed described the new water collection and water treatment at the facility. Water is collected on the roof as well as in planters and collection areas on-site. They added runoff filters and paved the entire facility, so all water is treated before it is discharged to the river. I noted a sulfur odor near the water treatment area on our way to the front entrance.
2. **Entrance, weighing area, and piles:** All vehicles that enter the facility are weighed and are tested for radioactivity. An inspector directs the trucks to either the sheer area or the shredder. To the west there was a large pile of automotive shredder residue (ASR). The pile we saw is depicted in photos P6020184 and P6020185 and is about 2 months backed up, according to Ed and Paul. They stated that they hose down the ASR pile to manage dust. I could see that the ASR pile was wet and there were wet areas on the ground. As we moved into the facility we could see the ASR sorting area and then the sheerer/guillotine (P6020187) and sheer material pile. We passed by a pile of shred that was about 15,000 tons, photo P6020186. The market determines how long a pile of shredded material sits on the site. Materials are piled by grade, for example cast iron is in a different pile than specialty metals.
3. **Shredder:** As we moved through the facility, we passed alongside the Duwamish river and then head back north. We walked by large stacks of crushed cars. The shredder was visible between piles and Ed and Paul talked me through the shredding process as we watched the shredder. This description is included above in the process description. There was a lot of steam as well as some smoky blue haze on the conveyor and at the shredder. There are videos of the shredder included with this inspection file. I saw oil on the puddles near the shredder entrance and to the east of the shredder. I asked about the wire insulation burner listed in the PSCAA permit and Ed told me that it was never operated and sold for scrap.

**4. Returned to the main office at 1:05 PM.**

**d) Closing Conference (10:50 AM – 11:00 AM)**

1. The closing conference was held beginning at 10:50 AM. The list of attendees is included below.
  - a. We reviewed the records and questions that I asked about in the opening conference.
  - b. I asked about the de-dusting system that was mentioned in passing a few times during the inspection. Paul and Ed explained that it is the baghouse.
  - c. I asked about any emission estimates that have been made by the company. They noted that they do not do emissions estimates.
2. Attendees:

- a. Ed Armstrong, Operations Manager
  - b. Paul Kirkman, Safety Manger
  - c. EPA Region 10: Sara Conley, Brendan Whyte, Elly Walters
3. The inspectors departed the facility around 11:00 am.

## **6. Post-inspection**

EPA will meet with PSCAA in August, 2022, to provide them with a preliminary overview of the inspection.